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Evan Haines/ICF/EPA,

I have just completed my review of the second final draft for Energy Star Qualified Residential Lighting Fixture Program Requirements 4.1, the proposed compliance changes for lighting fixtures. I would like to comment on one area, "Testing Orientation".

Testing Orientation

In the last round of comments, I expressed my concern about the multiple variations of lamp position and how that will result in quadruple the amount of paperwork filed by the manufacturer and processed by the EPA. I also suggested the addition of a category of testing that would have resolved the issues, "#5 - All". No change was made. While I still disagree strongly with this change, you must at least clarify your intent for variation #3 "50% base up, 50% base down". What does this mean? Does this allow me to use the lamp in either an up or down application, or does it allow me to use the lamp in ALL applications?

Again, I would point out that a lamp that operates in a base up situation is probably the most severe, with heat collecting in the ballast. This is typically the "worst-case scenario." If a lamp is tested in this position, why go to the trouble and cost forcing the lamp manufacturer to conduct tests in the other positions?

I urge you to reconsider this key point. If this point could be adjusted, I believe you would have a very solid and usable document.

Thank you for the opportunity to comment. Please feel free to pass my comments on to anyone interested. I am of course available for clarification.

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